

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBIN JOHNSON d/b/a CG JOHNSON &
COMPANY; JAMES QUINN; FAHMIA, Inc.; and
PRINZO & ASSOCIATES, LLC; individually, and
on behalf of all others similarly situated,

Plaintiffs,

v.

JPMORGAN CHASE BANK, N.A., doing business
as CHASE BANK; JPMORGAN CHASE & CO.;
and DOES 1 through 100,

Defendants.

20-cv-4100 (JSR)

JAMES QUINN, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

SIGNATURE BANK; and DOES 1 through 100,

Defendants.

20-cv-4144 (JSR)

FAHMIA, Inc., individually and on behalf of all
others similarly situated,

Plaintiff,

v.

MUFG AMERICAS HOLDING CO.; MUFG
UNION BANK, N.A.; and DOES 1 through 100,

Defendants.

20-cv-4145 (JSR)

FAHMIA, Inc., individually and on behalf of all
others similarly situated,

Plaintiff,

v.

CITIBANK, N.A.; CITIGROUP INC.; and DOES 1
through 100,

Defendants.

20-cv-4146 (JSR)

ROBIN JOHNSON d/b/a CG JOHNSON &
COMPANY; JAMES QUINN; FAHMIA, Inc.; and
PRINZO & ASSOCIATES, LLC; individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A., d/b/a CHASE
BANK; and JP MORGAN CHASE & CO.,

Defendants.

20-cv-4858 (JSR)

**DECLARATION OF SYLVIA E. SIMSON
IN SUPPORT OF DEFENDANTS' MOTIONS TO DISMISS**

I, SYLVIA E. SIMSON, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am affiliated with the law firm Greenberg Traurig, LLP, attorneys for Defendant JPMorgan Chase Bank, N.A. and Specially Appearing Defendant JPMorgan Chase & Co. (together, "Chase") in Case Nos. 20-CV-4100 and 20-CV-4858 captioned above (the "Litigation").

As such, I am fully familiar with the facts and circumstances set forth herein.

2. I make this declaration in support of Chase's Motion to Dismiss all claims asserted against it in the Litigation for failure to state a claim and lack of subject matter jurisdiction.

2. Attached as Exhibit L is a true and correct copy of a Note entered into between JPMorgan Chase Bank, N.A. and one of the borrowers identified as a client of Plaintiff James Quinn in the Complaints in Case Nos. 20-CV-4100 and 20-CV-4858 (the “Note”). This Note, which has been redacted by my firm due to confidentiality concerns and to protect the identity of the non-party borrower and other personal information regarding the loan, should be in the possession, custody, or control of Quinn and/or the borrower identified by Quinn. I have been advised by JPMorgan Chase Bank, N.A. that this Note is an exemplar of notes entered into by Chase borrowers under the Paycheck Protection Program.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of July, 2020 in New York, New York.



SYLVIA E. SIMSON

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